



CITY WATER, LIGHT AND POWER
CITY OF SPRINGFIELD, ILLINOIS

MISTY BUSCHER, MAYOR
DOUG BROWN, CHIEF UTILITY ENGINEER

April 16, 2025

Mr. Lee Zeldin, Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Mail Code 1101A
airaction@epa.gov

Re: Presidential Exemption, National Emissions Standards for Hazardous Air Pollutants:
Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk
and Technology Review (89 FR 38508; May 7, 2024) (MATS Rule), for City Water,
Light and Power – Dallman Unit 4

Dear Administrator Zeldin:

Background

City Water, Light and Power (CWLP) is a municipally owned utility serving the City of Springfield, Illinois. Dallman Unit 4, commissioned in 2009, is CWLP's newest coal-fired generating unit and is equipped with state-of-the-art air pollution control technologies. The unit plays a vital role in Springfield's electricity supply and regional grid reliability through its participation in the Midwest Independent System Operator (MISO).

On May 7, 2024, the U.S. Environmental Protection Agency (EPA) published the final rule entitled "National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units—Review of the Residual Risk and Technology Review" (89 FR 38508). This rule formally eliminated the Filterable Particulate Matter Low Emitting Electric Generating Unit (FPM LEE) designation formerly achieved by demonstrating emissions rates at or below 50% of the 0.030 lb/mmBtu standard over a three-year period. This in effect mandated continuous Filterable Particulate Matter emissions monitoring (FPM CEMS) for compliance.

On April 8, 2025, President Donald J. Trump issued a proclamation under Section 112(i)(4) of the Clean Air Act entitled "Regulatory Relief for Certain Stationary Sources to Promote American Energy." This action authorized a two-year exemption for selected coal-fired units, citing national security, economic hardship, and technological limitations as justification. Dallman Unit 4 is not among those units exempted in Annex I Stationary Sources List as

published on April 15, 2025. CWLP respectfully submits this request for an individual exemption under the same statutory authority or for inclusion on the Annex I list.

EPA Administrator Lee Zeldin has also announced plans to reconsider the Biden-era MATS revisions, citing excessive economic impacts and pending legal challenges from 23 states. These developments further support CWLP's pursuit of near-term regulatory flexibility while national energy and environmental policy is reassessed.

1. Technological Unavailability

The May 2024 final MATS rule eliminated the FPM LEE designation and mandated continuous emissions monitoring (FPM CEMS). Dallman Unit 4 previously qualified as an FPM LEE, consistently achieving PM levels well below regulatory thresholds. Recent vendor outreach has shown the difficulty in obtaining retrofit or new systems to monitor PM for units such as Dallman Unit 4. Also, broadly speaking and in alignment with the American Public Power Association (APPA), CWLP affirms that no new control technologies have emerged to justify the revised compliance framework of the final rule.

2. Emissions Performance Data

Dallman Unit 4 has consistently demonstrated filterable particulate matter emissions well below both the original and revised MATS thresholds. Under the prior standard, the emissions limit for FPM was 0.030 lb/MMBtu. The May 2024 final rule significantly tightened this limit to 0.010 lb/MMBtu—a two-thirds reduction.

Across multiple stack tests conducted between 2020 and 2024, Dallman Unit 4 has recorded emissions as low as 0.00025 lb/MMBtu and has consistently remained below 0.0009 lb/MMBtu. These levels are not only well under the previous limit but are also substantially below the revised standard, underscoring the unit's exceptional performance and continued eligibility—on a technical basis—for a low-emitting designation.

3. National Security and Grid Reliability Considerations

Dallman Unit 4 plays a critical role in maintaining regional electric reliability in central Illinois and throughout MISO. The unit is relied upon to support voltage stability, fulfill reserve margin commitments, and provide flexible baseload generation.

Electric load forecasts for the region project significant increases over the coming decade, largely driven by electrification trends, industrial development, and the expansion of energy-intensive data centers. These demands will place added pressure on grid operators to maintain resource adequacy and resilience.

President Trump's Executive Order 14154, "Unleashing American Energy," and the accompanying Presidential Proclamation on Regulatory Relief underscore the administration's view that continued operation of existing coal generation assets is a national security imperative. The regulatory burdens imposed by the regulations such as the revised MATS rule risk accelerating unit retirements at a time when resource adequacy is already strained, as system

operators such as PJM and MISO have affirmed. Curtailing Dallman Unit 4 would undermine both local reliability and broader grid resilience objectives.

A two-year exemption under CAA §112(i)(4) will help ensure that Dallman Unit 4 remains online to meet near-term energy security needs while EPA reconsiders the 2024 final rule and grid reliability challenges are addressed.

Conclusion

In light of the unavailability of proven technologies, the economic hardship imposed by the revised rule, and Dallman Unit 4's critical role in maintaining energy security and reliability, CWLP respectfully requests that EPA grant a two-year exemption from the compliance requirements of the 2024 MATS revision for this unit. This request is submitted under Section 112(i)(4) of the Clean Air Act and in accordance with EPA's March 2025 solicitation for Presidential Exemption applications.

This request aligns with the April 2025 Presidential Proclamation granting a blanket exemption to similarly situated coal-fired generating units and is consistent with CWLP's historical performance, technological configuration, and public interest mission. Dallman Unit 4 is not included in the list of nationally exempted units, CWLP seeks an individual exemption based on parity and the distinct regulatory and operational burdens faced by public power entities or for the inclusion of the unit in the Annex I Stationary Sources List. CWLP intends to maintain all other MATS-related controls and monitoring obligations during the exemption period.

CWLP is committed to public health, transparency, and environmental stewardship. We welcome continued dialogue with EPA staff and stand ready to work collaboratively on long-term emissions compliance strategies and energy security goals.

Respectfully submitted,



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